



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

ICR  
F. # 2015R00096

*271 Cadman Plaza East  
Brooklyn, New York 11201*

December 15, 2015

By Hand and ECF

The Honorable Margo K. Brodie  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Juvenile Male  
Criminal Docket No. 15-302  
United States v. Munther Omar Saleh, et al.  
Criminal Docket No. 15-393

Dear Judge Brodie:

On consent of the parties, the government encloses the proposed Order Modifying Protective Orders regarding unclassified discovery in each of these cases, to permit defense counsel to share unclassified discovery with defense counsel of record in each of the above-captioned cases. The government respectfully requests that the Court enter the enclosed Order Modifying Protective Orders in these cases.

Respectfully submitted,

ROBERT L. CAPERS  
United States Attorney

By: /s/ Ian C. Richardson  
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Douglas M. Pravda  
Ian C. Richardson  
Assistant U.S. Attorney  
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Enclosure

cc: Defense Counsel of Record (by Email)